

**UNITED STATES DISTRICT COURT
FOR THE NORTHER DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

)
) **CASE №: 3:14-cv-03181 JD**
)
) **THIRD STIPULATION TO STAY**
) **PROCEEDINGS AND EXTEND**
) **DEADLINE TO RESPOND TO**
) **ORDER TO SHOW CAUSE FOR**
) **ONE ADDITIONAL WEEK AND**
) **[PROPOSED] ORDER**
)

THIRD STIPULATION AND PROPOSED ORDER
3:14-CV-03181-JD

1 **WHEREAS**, the Parties previously filed Stipulations to Stay Proceedings in order to
2 explore settlement which the Court granted, admonishing the parties that no further stays
3 would be granted; and

4 **WHEREAS** the Parties represent to the Court that they have diligently pursued in
5 settlement negotiations which have been fruitful, and have agreed to the majority of terms and
6 reduced those terms to a comprehensive settlement agreement, but have not yet finalized
7 terms required to verify compliance with the agreement, but anticipate being able to come to
8 an agreement on verification terms shortly;

9 **WHEREAS** the Parties are both individuals who do not have the support, means, or
10 time that a business enterprise would have to devote to settlement discussions and one of the
11 Parties is not represented by counsel;

12 **WHEREAS** the Parties have negotiated in earnest and exchanged multiple revisions
13 of draft settlement agreements back and forth;

14 **WHEREAS** transferring this matter to a new court in another jurisdiction on the cusp
15 of settlement would be a waste of judicial and individual resources and could disrupt the
16 balance that has enabled the parties to reach their current positions;

17 **WHEREAS** the Parties respectfully request that the Court reconsider its previous
18 admonition and stay the proceedings for one additional week while the Parties finalize
19 settlement discussions and execute the written agreement.

1 **THEREFORE**, the Parties do hereby **STIPULATE** as follows,

2 The Parties request that the Court stay the proceedings for one additional week while
3 the Parties finalize settlement discussions.

4 **SO STIPULATED**

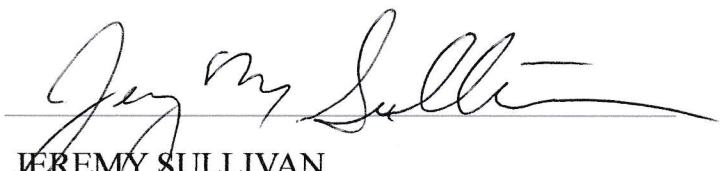
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6 */s/ D. Gill Sperlein*

7 Dated: 10/29/15

8
9 D. GILL SPERLEIN

10 Counsel for plaintiff, Sara Browalski

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12 Dated: 10/29/15

13 
14 JEREMY SULLIVAN
15 Defendant, pro per

16
17
18 **[PROPOSED] ORDER**

19 In light of the parties' representations re settlement discussions, the Court continues the
20 deadline to respond to its order to show cause (Dkt. No. 37) until November 6, 2015
21

22
23
24 Dated: _____

25 _____
26 JAMES DONATO
27 UNITED STATES DISTRICT JUDGE
28